



May 24, 2017

Ms. Verena Radulovic  
Product Manager  
ENERGY STAR for Consumer Electronics  
United States Environmental Protection Agency  
Office of Air and Radiation  
Washington DC, 20460

Dear Ms. Radulovic,

LG Electronics appreciates the opportunity to provide comments, and we respectfully request that the EPA take these comments into consideration for the next draft of the Version 8 TV ENERGY STAR specification.

#### **On mode Requirement**

**According to the draft 2 of the ENERGY STAR TV V.8.0 spec, only one Preset Picture Setting is allowed for turning off ABC and other energy saving functions by default regardless of the number of the Preset Picture Settings available for each product.**

#### **[Proposal]**

**We propose to set the number of the allowed Preset Picture Settings without ABC and other energy saving functions turned on by default to 2 Preset Picture Settings, which is same as the draft 1.**

We strongly believe manufacturers need at least two Preset Picture Settings which can provide the brightest picture in the Vivid and HDR Effect modes.

Vivid mode is to display the brightest picture the TV can support technically to boast picture performance. Manufacturers implemented a unique picture algorithm to convert the Standard Dynamic Range content (SDR) to HDR level to provide HDR-like picture experiences to the user by turning on the HDR Effect mode.

Even though Amazon and Netflix provide HDR streaming services, very little HDR content is currently available. To meet increasing customer demands for high picture quality, manufacturers implemented brighter lights and darker blacks with enhanced contrast ratio for HDR effects.

#### **Automatic Brightness Control (ABC) feature**



**The luminance at 3 lux in the Default Picture Setting, with ABC enabled, is greater than or equal to 125 nits(cd/m<sup>2</sup>)**

**[Proposal]**

**We suggest setting the luminance level of Default Picture Setting to be higher by a certain percentage relative to the Brightest Selectable Picture Setting limited to models with a low module brightness spec (such as those models with brightness of lower than 200 nits), rather than requiring the luminance to be greater than or equal to 125 nits at 3 lux across all models.**

Some Full HD models have natively lower brightness spec and cannot fundamentally meet the 125 nits,, which will make it impossible for these inherently energy efficient TVs to achieve ENERGY STAR certification based on the EPA's latest draft. Manufacturers need to consider brightness deviations caused by each module brightness and light sensor, and modules with 200 nits or lower brightness cannot meet the 125 nits requirement.

As there are various kinds of models with different brightness spec for TVs, we strongly recommend EPA to take these brightness variations per model into consideration and provide an equal opportunity to all TV models to meet the ENERGY STAR certification conditions.

We expect that the current ENERGY STAR V 8.0 Draft 2 revision will cause most of manufacturers not to meet the ENERGY STAR specifications. As such, we respectfully request for the relaxation of your proposed approach.

Cordially,

A handwritten signature in black ink, appearing to read 'John Taylor', written in a cursive style.

John I. Taylor

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